

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF INDIANA
NEW ALBANY DIVISION

IN RE:)	Chapter 11
)	
EASTERN LIVESTOCK CO., LLC, et al.,)	Case No. 10-93904-BHL-11
)	
Debtors.)	
)	
FRIONA INDUSTRIES, L.P.,)	
)	
Plaintiff,)	
)	
v.)	Adversary Proceeding No. 11-59093
)	
EASTERN LIVESTOCK CO., LLC, et al.,)	
)	
Defendants.)	
)	
and)	
)	
CACTUS GROWERS, INC.,)	
)	
Intervenor,)	
)	
v.)	
)	
EASTERN LIVESTOCK CO., LLC, et al.,)	
)	
and)	
)	
J & F OKLAHOMA HOLDINGS, INC.,)	
)	
Intervenor,)	
)	
v.)	
)	
EASTERN LIVESTOCK CO., LLC, et al.,)	
)	
Defendants.)	

TRUSTEE'S RULE 30(b)(6)
NOTICE OF DEPOSITION OF BYNUM RANCH

Please take notice that, pursuant to Fed. R. Civ. P. 30(b)(6) and Fed. R. Bankr. P. 7030, James A. Knauer ("Trustee"), as the trustee of Eastern Livestock Co., LLC ("ELC"), by counsel, will take the deposition of Bynum Ranch Company beginning at 10:00 a.m. on August 27, 2013 at the offices of HAY, WITTENBURG, DAVIS, CALDWELL & BALE, LLP, One East Twohig, Third Floor, San Angelo Texas before a court reporter authorized to administer oaths. The deposition will be conducted in accordance with the July 3, 2012 Order Establishing Deposition Protocols [Main Case, Doc. 1229]. You are invited to appear and take part in such examination.

Definitions

Definitions applicable to this Notice of Deposition include the following:

1. You, "your," and "Bynum Ranch" means and refers to Bynum Ranch Company and includes all persons and organizations under your control, including but not limited to your parents, subsidiaries, affiliates, officers, directors, employees, attorneys, accountants, agents, and representatives of any kind.
2. "ELC" or "Eastern" means and refers to Eastern Livestock Co., LLC, and includes its affiliates, members, officers, employees, attorneys, agents, accountants, and representatives of any kind.
3. "Trustee" means and refers to James A. Knauer, as the duly appointed Chapter 11 trustee for Eastern Livestock Co., LLC, and includes his attorneys, agents, and representatives of any kind.
4. "Cattle" means and refers to the 304 head of cattle that Bynum Ranch and others purchased and sold and that are the subject of paragraph 8 of your Counterclaims and Cross-Claims filed in the above-captioned AP (Doc. No. 236).

Subjects of Examination

Examination is requested on any and all knowledge possessed by or reasonably available to Bynum Ranch relating to the following matters:

1. Any agreement, oral or written, relating to any of the Cattle.
2. The purchase or sale of any of the Cattle to any person or entity.
3. Any payment that Bynum Ranch made or received for any of the Cattle.
4. Bynum Ranch's business dealings generally with ELC during 2009 and 2010.
5. Bynum Ranch's business dealings generally with Friona Industries, L.P. or any related entity during 2009 and 2010.
6. Bynum Ranch's business dealings generally with Randy Lloyd during 2009 and 2010.
7. Bynum Ranch's business dealings generally with Robert Brown during 2009 and 2010.
8. Any conversations that any representative of Bynum Ranch had with anyone concerning payment for any of the Cattle.
9. Any conversations that any representative of Bynum Ranch had with anyone concerning any of the Cattle.

10. All purchase orders, invoices, shipping records, trucking records, or other records that relate to any of the Cattle.

FAEGRE BAKER DANIELS LLP

By: /s/ Kevin M. Toner

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Counsel for James A. Knauer, Chapter 11 Trustee

CERTIFICATE OF SERVICE

I certify that on August 12, 2013, a copy of the foregoing was served via email on the following counsel of record:

Deborah Caruso on behalf of Third Party Defendant Kathryn Pry
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Laura Day DelCotto on behalf of Third Party Defendants Southeast Livestock Exchange, LLC, Piedmont Livestock, Inc., Moseley Cattle Auction, LLC, and East Tennessee Livestock Center, Inc.

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Amelia Martin Adams on behalf of Third Party Defendant Southeast Livestock Exchange, LLC

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U.S. Trustee

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James T Young on behalf of Intervenor Michael Walro

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I further certify that on August 12, 2013, a copy of the foregoing pleading was mailed by first-class U.S. Mail, postage prepaid and properly addressed, to the following:

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/s/ Kevin M. Toner
